

UNITED STATES OF AMERICA,)
)
v.)
)
GLEN CASADA and)
CADE COTHREN,)
)
Defendants.)

requests and has said it may need hard drives of additional terabytes for the remaining discovery productions.

6. The government has advised undersigned counsel that the government intended to provide the first production in response to Mr. Cothren's discovery requests to undersigned counsel the week of July 10, 2023, and to provide remaining data shortly thereafter.

7. Undersigned counsel will need sufficient time to review the anticipated supplemental discovery productions and determine if any motions regarding discovery issues are necessary.

8. Undersigned counsel has conferred with Assistant United States Attorney Amanda Klopf who states that the government does not oppose Mr. Cothren's Motion to extend the deadline for 30 days.

9. Mr. Cothren reserves the right to request further extensions of upcoming deadlines based on the timing and volume of the government's forthcoming supplemental document productions.

For all the above reasons, Mr. Cothren respectfully requests this Court enter an Order extending the deadline for Mr. Cothren to file any motions regarding discovery issues from July 17, 2023 to a date not earlier than August 17, 2023.

Respectfully Submitted,

Sherwood Boutique Litigation, PLC

/s/ Cynthia A. Sherwood
Cynthia A. Sherwood, #20911
Austin M. Correll, #39561
414 Union Street
Suite 1110
Nashville, TN 37219
T: 615-873-5670
F: 615-900-2312
cynthia@sherwoodlitigation.com
austin@sherwoodlitigation.com
Counsel for Defendant Cade Cothren

Barnes & Thornburg LLP

/s/ Joy Boyd Longnecker
Joy Boyd Longnecker, #29627
827 19th Avenue South
Suite 930
Nashville, TN 37203-3447
T: 615-925-9506
Joy.Longnecker@btlaw.com
Counsel for Defendant Cade Cothren

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing has been served on the following via the Court's CM/ECF system to:

Amanda J. Klopf, Esq.
Assistant United States Attorney
719 Church Street, Suite 3300
Nashville, TN 37203
Amanda.Klopf@usdoj.gov

John P. Taddei, Esq.
Trial Attorney
Public Integrity Section, Criminal Division
U.S. Department of Justice
1301 New York Ave., NW
Washington, DC 20530
john.taddei@usdoj.gov

on this the 14th day of July 2023.

/s/ Cynthia A. Sherwood